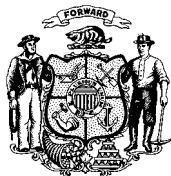


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TO: Economic Support Supervisors
Economic Support Lead Workers
Training Staff
Child Care Coordinators
W-2 Agencies
Workforce Development Boards
Job Center Leads and Managers

FROM: Amy Mendel-Clemens
Communications Section
Bureau of Health Care Eligibility
Division of Health Care Financing

BHCE/BWP OPERATIONS MEMO

No: 04-65

DATE: 12/17/2004

FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	SC	<input type="checkbox"/>
CTS	<input type="checkbox"/>	CC	<input type="checkbox"/>	W-2	<input checked="" type="checkbox"/>
FSET	<input type="checkbox"/>	EA	<input type="checkbox"/>	CF	<input type="checkbox"/>
JAL	<input type="checkbox"/>	JC	<input type="checkbox"/>	RAP	<input type="checkbox"/>
WIA	<input type="checkbox"/>	WtW	<input type="checkbox"/>		
Other	EP	<input type="checkbox"/>	★		

PRIORITY: HIGH

SUBJECT: **CARES Edit for W-2 Non-Participation**

CROSS REFERENCE: Wisconsin Works Manual – Chapters 10 & 11
Operations Memo 01-21

EFFECTIVE DATE: January 21, 2005

PURPOSE

This memo provides information regarding a new CARES edit that will prevent the posting of non-participation hours that overlap different Wisconsin Works (W-2) placement types.

BACKGROUND

A 2001 Legislative Audit Bureau (LAB) report indicated that W-2 participants have received sanctions while in non-sanctionable placements. Since that time, the Department of Workforce Development (DWD) has taken a number of steps to address concerns raised in the report. However, DWD has identified the need to add a new CARES edit. This edit will ensure that inappropriate sanctions are not imposed as the result of workers attempting to track a period of non-participation that begins during a sanctionable placement and ends during a non-sanctionable placement or visa versa.

The new CARES edit will also prevent posting of any non-participation hours that cover more than one W-2 placement.

NOTE ➤ Non-sanctionable placements include Caretaker of a Newborn (CMC), Case Management Follow-up (CMF), Case Management Unsubsidized Employment (CMU), Case Management Job Ready (CMS) and Trial Job (TJB). Sanctionable placements are W-2 Transition (W-2 T), and Community Service Jobs (CSJ) including (CS1, CS2, CS3).

CARES PROCESSING

ENTERING DATES OF NON-PARTICIPATION

Effective January 21, 2005, when posting hours of non-participation on WPNH, the dates of non-participation cannot overlap W-2 placements.

Current CARES Functionality

Currently, W-2 workers are able to post a period of non-participation on WPNH for up to 40 hours over a seven-day period. The begin-date and the end-date for the non-participation period need not occur during the same W-2 placement.

New CARES Functionality

The new CARES functionality will prevent workers from posting a period of non-participation that overlaps different W-2 placements. The begin and end dates for a period of non-participation may only be entered for the days the participant was in one W-2 placement type. A CARES edit has been created that will display if a worker attempts to post non-participation hours over a period of time when the participant was in more than one W-2 placement type. This edit will address concerns raised in the LAB report regarding hours sanctioned while a participant was in a non-sanctionable placement. This edit will also prevent posting nonparticipation hours during a period of time that overlaps into any other W-2 placement. Nonparticipation hours that overlap more than one W-2 placement type will need to be split so the begin and end dates fall with one W-2 placement.

The following example illustrates how this process will work when a participant is moved from one placement to another placement:

Example: Lisa was in a CMS placement from June 17, 2004 to August 25, 2004. On August 26th Lisa was placed in a CSJ. During her CMS placement Lisa was assigned to attend employment search 20 hours a week. Lisa failed to meet her employment search requirement from August 23rd to August 27th, without providing good cause for the missed hours. On September 7th, the FEP enters non-participation hours on CARES screen, WPNH for missed employment search activities. The FEP attempts to enter the non-participation dates as August 23rd through August 27th, but CARES prevents this entry. An edit displays on CARES informing the FEP that the non-participation hours overlap a change in placement types. The worker must then split the non-participation hours into two separate entries, with one entry covering August 23rd to August 25th and the other covering August 26th to August 27th.

NON-PARTICIPATION FOR CSJ OR W-2 T PARTICIPANTS WHO MOVE TO CMC

When a participant is in a CSJ or W-2 T placement immediately prior to being placed in CMC, it is possible for the individual to have a reduced W-2 payment after the CMC placement begins as a result of non-participation that occurred while still placed in the CSJ or W-2 T.

For an ongoing W-2 case, the participation period and payment timeframe for CMC is the same as for CSJ or W-2 T. The participation period begins on the 16th of the month and runs through the 15th of the following month. The payment amount is based on the last placement in the participation period and the payment is issued just before the first of the month following the end of the participation period. Non-participation in a CSJ or W-2 T may reduce a CMC payment if the

non-participation, with no good cause, occurred in the same participation period in which the participant was placed in CMC.

The following example illustrates this process:

Example: Jenny is in a CSJ placement from February 16th through March 10th. On March 11th, she reports the birth of her child and is placed in CMC and remains in that placement for 12 weeks. Between February 16th and February 20th, while still participating in the CSJ placement, Jenny missed 10 hours of assigned activity without good cause.

Jenny's April and May W-2 payments are based on the following:

- The April W-2 payment is based on participation in the W-2 program between February 16th and March 15th and the participant's placement on the last day of the participation period. Although Jenny was in the CMC placement at the end of this participation period, the \$673 payment will be reduced for the 10 hours of non-participation she incurred while still in the CSJ placement.
- The May W-2 payment is based on participation in the W-2 program between March 16th and April 15th. Jenny will receive \$673 based on her placement in CMC throughout this timeframe

CARES EDIT

The highlighted error message, "CHECK ACWI: NON-PART DATES CANNOT OVERLAP THE W-2 PLACEMENT CHANGE DATE" will be displayed along the bottom of the WPNH CARES screen:

WPNH	NON-PARTICIPATION HISTORY	10/04/04 14:26 XCT266 K CLOUGH
PIN: 1100648470 SCREEN-INW2 UPDATE CTY/TRIBE: 40 REGION: 01 OFFICE: 1571 NEXT PIN: _____		
NON-PART DATE: 09 14 2004 THRU 09 20 2004 NON-PART OFFICE: COMP/STAT: es ACTIVITY CODE: ____		
NP TYPE: ag NP STATED RSN: nn NP HOURS: 010 GC : n GC HOURS: ____ GC RSN: ____ INCOMPLETE BST IND: ONGOING ASSESSMENT IND: PRIMARY COMMENT: _____ ADDITIONAL COMMENT: _____		
PF19 WPNP PF14 COPY TO SAME PIN PF15 COPY TO NEW PIN PF13 WPNH NEXT TRAN: _____ PARMS: 1100648470 BWG - CHECK ACWI: NON-PART DATES CANNOT OVERLAP THE W-2 PLACEMENT CHANGE DATE		

CONTACTS

BHCE CARES Information & Problem Resolution Center

★Program Categories – FS – Food Stamps, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – Food Stamp Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WtW – Welfare to Work, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

DWD/DWS/BW-2/JK